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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JAMES PORTER, BRYAN PEREZ, and
DRO ESRAEILI ESTEPANIAN, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

TESLA, INC.,

Defendant.

Case No. 4:23-cv-03878-YGR

**STIPULATION TO CHANGE TIME FOR
DEFENDANT TESLA, INC. TO RESPOND
TO THE CLASS ACTION COMPLAINT**

Judge: Hon. Yvonne Gonzalez Rogers

Compl. Filed: August 2, 2023

Pursuant to N.D. Cal. Civ. L.R. 6-1 and 6-2, and as supported by the Declaration of Mark A. Feller filed herewith, Defendant Tesla, Inc. (“Tesla”) and Plaintiffs James Porter, Bryan Perez, and Dro Esraeili Estepanian (collectively “Plaintiffs” and together with Tesla, the “Parties”), by and through their undersigned counsel, stipulate as follows:

WHEREAS, on August 2, 2023, Plaintiffs filed this action (Dkt. No. 1);

WHEREAS, on August 7, 2023, Plaintiffs served a copy of the complaint and summons on Tesla (Dkt. No. 9);

WHEREAS, on August 21, 2023, Tesla filed an Administrative Motion to Consider Whether Cases Should Be Related (Dkt. No. 21) seeking to have two cases – *Alejandro Corona and Cabanillas & Associates, P.C. v. Tesla, Inc.*, Northern District of California, Case No. 3:23-cv-03902-VKD) and *Samuel Van Diest and Sergy Khalikululov, et al.*, Northern District of California, Case No. 4:23-cv-04098 – related and reassigned to this Court;

WHEREAS, considering the pending nature of Tesla’s Administrative Motion to Relate Cases, the number of claims and potential plaintiffs, and the importance of having fulsome briefing of any pre-answer motions, Tesla’s counsel requested, and Plaintiffs’ counsel agreed to, a 46-day extension of time for Tesla to respond to the Complaint to October 13, 2023;

THEREFORE, the Parties have met and conferred and, through their respective counsel, have stipulated that Tesla’s deadline to respond to Plaintiffs’ Complaint is extended up to and including **October 13, 2023**.

1. Tesla shall respond to Plaintiffs’ Complaint on or before October 13, 2023;

IT IS SO STIPULATED AND AGREED.

Dated: August 23, 2023

By /s/ Mark A. Feller

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Attorneys for Defendant Tesla, Inc.

1 Dated: August 23, 2023

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11 *Esraeili Estepanian*

12 **SIGNATURE ATTESTATION**

13 I hereby attest that, pursuant to N.D. Cal. Civ. L.R. 5-1(i)(3), the concurrence to the filing
14 of this document has been obtained from each signatory hereto.

15 Dated: August 23, 2023

/s/ Mark A. Feller

16 Mark A. Feller